

*KIRTON LAW FIRM*

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December 12, 2021

VIA ELECTRONIC FILING

Honorable Paul G. Gardephe  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *United States v. Alexei Saab, 19 cr. 676 (PGG)*

Dear Judge Gardephe:

I represent Alexei Saab in the above-referenced matter. This Court set a trial date of January 10, 2022. The Court ordered trial motions<sup>1</sup> be filed on or before December 13, 2021. The Defense requests a one-week extension to file trial motions.

This Court set December 13, 2021, for trial motions. The Court ruled on the pre-trial motions on December 10, 2021.<sup>2</sup> The Defense needs additional time to file trial motions. The Defense requests until December 20, 2021, to file trial motions. The Government takes no position on this request but respectfully requests that if the Court grants the defendant's adjournment, the Court grant the Government the same adjournment of the deadline for its pre-trial filings.

Please contact me if you have any questions or concerns.

Sincerely,

s/Marlon G. Kirton

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<sup>1</sup> Motions in limine, proposed voir dire and proposed requests to charge

<sup>2</sup> The Court set December 27, 2021, for Defense's CIPA motions.

Marlon G. Kirton, Esq.

cc: Jason Richman, Assistant United States Attorney (via electronic mail)  
Samuel Adelsberg, Assistant United States Attorney (via electronic mail)  
Esere Onaodowan, Esq. (via electronic mail)  
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